

PPG Industries

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To  
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cc

bcc

Subject

Nanomaterials Business Impact Survey [No Protective Marking]

DOCUMENT NOT YET CLASSIFIED

Name: Kevin Fay (PPG Industries, Inc. on behalf of:  
Organisation: PPG Industries Australia PTY Ltd.

Is this Confidential:  
Confidential Information:

Business in the Chemical Industry: Other  
If Other: Coatings manufacturer

Question 1:  
Manufacturer Of Nanomaterials:  
Importer Of Nanomaterials:  
Importer of Products Containing Nanomaterials: Yes

Question 2:  
Business currently registered with NICNAS: Yes

Question 3:  
Teir 1: Yes  
Teir 2:  
Teir 3:

Question 4:  
Substances that you import or manufacture would be classified as an industrial nanomaterial :  
Various

What type of nanomaterials are these, and what is their intended application :  
Components of paints and coatings

Question 5: If interested, under which of the following exemption categories:  
Low Volume:  
Transshipment:  
Research and Development:

Question 6:  
We would be concerned that both approaches would lead to unpredictable data requests, undue compliance costs and approval delays.

Question 7: Yes  
There are currently many safe uses of nanomaterials in products. Manufacturers with knowledge of their products and uses can make appropriate self-assessments. This will allow useful and well understood nanomaterial applications to be placed on the market without undue delay. NICNAS may want to have these self-assessed materials reported under one of the proposed or other reporting programs.

Question 8: Yes  
Under the current proposal, it appears all nanomaterials will require

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extensive hazard and exposure review prior to commercial use. While this may be an appropriate and prudent approach for truly new nanomaterials, there are many uses that may be delayed or withdrawn due to the cost and time to meet compliance requirements. There needs to be a process to: 1) differentiate between current safe applications of nanomaterials and new nanomaterials and uses that truly need additional assessment; and 2) a phase-in time period that focuses initially on data collection and evaluation prior to implementing restrictions that may not be warranted based on risk.

Question 9:

We have not completed an assessment of this proposal.

Question 10:

Regulatory burden has not been determined. Potential cost impacts would depend on the extent and depth of the reporting scheme. Reporting should address categories of nanomaterials and uses to minimize multi-reporting of very similar nanotechnology applications. Known safe uses of nanomaterials should be exempted from most reporting and assessment requirements.

Question 11: Yes

The program is feasible but may be disruptive to the supply chain as downstream users may not know the status of notifications and assessments for critical nano raw materials.

Question 12: No

Some basic physical data would likely be available but more extensive Use Scenarios, Toxicology/Ecotoxicology data may be limited. The cost and difficulty of obtaining these data would depend on the nature of the data requests. Additionally, there could be significant costs associated with the collection of size, shape, impurity, surface properties and other physical properties for manufacturers who use nanomaterials in their products but do not produce the nano raw materials. Securing these detailed data from suppliers, especially if located outside Australia, could be extremely difficult and time-consuming.

Question 13: Yes

The proposal to conduct case-by-case assessments could be time-consuming and lead to long delays in use of materials (unless current uses are "grandfathered" pending completion of the review). Case-by-case assessments will likely lead to multiple data calls from different nano introducers adding regulatory costs across industry. The government should consider categories of nanomaterials and categories of uses for assessment, thereby addressing similar risk scenarios only once.

Question 14: Yes

The proposals appear likely to add considerable regulatory burden to manufacturers, importers and users in Australia including costs for data collection, testing and submissions to NICNAS. Some of the Risk Assessment procedures to be completed by NICNAS appear to be potentially time-consuming and likely to delay product development, manufacturing and introductions. Excessive burdens could prompt decisions to move manufacturing to other locations outside Australia or not commercialize new products in Australia.

Question 15: Decrease

Some competitors may take certain products off the market or elect to leave the market entirely. We urge continued review of other national and international nanotechnology management initiatives to assure alignment and consistency of requirements.

Question 16: Yes

Less competition could result in increased cost of consumer products.

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Manufacturers and importers may choose to reduce the number and types of products on the market reducing consumer choices. The regulations may create undue concern regarding specific nanomaterials and their uses instead of supporting the collection and evaluation of useful risk information.

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